

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

MAR - 6 2019

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSASJAMES W. McCORMACK, CLERK  
By:  CLERK

UNITED STATES OF AMERICA )

No. 4:19CR 00116 JM

v. )

18 U.S.C. § 2320, 2

ANDREW SCOTT PIERSON )

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT 1**

Beginning in or about 2016 and continuing to on or about December 10, 2018, in the Eastern District of Arkansas, and elsewhere, the defendant,

**ANDREW SCOTT PIERSON,**

voluntarily conspired with others known and unknown to the grand jury to intentionally traffic in goods, that is, Colt firearm parts, and, on and in connection with such goods, knowingly used counterfeit Colt marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive. In furtherance of this conspiracy, in or about May 2017, ten unfinished, 80% complete, AR-15-type firearm lower receivers bearing counterfeit Colt marks were shipped from California to the Eastern District of Arkansas, in violation of Title 18, United States Code, Sections 2320(a)(1) and (a)(2), and Title 18, United States Code, Section 2.

**[END OF TEXT. SIGNATURE PAGE ATTACHED.]**